

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

COUNT 1: 18 U.S.C. § 2252A(a)(3)(B) -- Solicitation of Child Pornography

COUNT 2: 18 U.S.C. § 371 & 2261A(2)(B) -- Conspiracy to Commit Cyberstalking

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: COUNT 1: Min. 5 years prison, max. 20 years prison, \$250,000 fine, min. 5 years sup. release, max. lifetime sup. release, restitution, forfeiture, up to \$40,100 in special assessments
 COUNT 2: 5 years prison, \$250,000 fine, 3 years of sup. release, restitution, \$100 mandatory special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ Delaney Tang

DISTRICT COURT NUMBER

4:21-cr-00057-HSG

FILED

Feb 10 2021

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a pending case involving this same defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

4:20-mj-71569

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned)

SAUSA Christopher Vieira

DEFENDANT**IS NOT IN CUSTODY**
 1) ☐ Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior summons was served on above charges ▶
2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

COUNT 2: 18 U.S.C. § 371 & 2261A(2)(B) -- Conspiracy to Commit Cyberstalking

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: COUNT 2: 5 years prison, \$250,000 fine, 3 years of sup. release, restitution, \$100 mandatory special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

Vincenz Sison

DISTRICT COURT NUMBER

4:21-cr-00057-HSG

FILED

Feb 10 2021

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

4:20-mj-71569

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

SAUSA Christopher Vieira

DEFENDANT**IS NOT IN CUSTODY**
 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

DAVID L. ANDERSON (CABN 149604)
United States Attorney

FILED

Feb 10 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:21-cr-00057-HSG
)	
Plaintiff,)	VIOLATIONS:
)	18 U.S.C. § 2252A(a)(3)(B) – Solicitation of Child
v.)	Pornography
)	18 U.S.C. §§ 371 & 2261A(2)(B) – Conspiracy to
DELANEY TANG and VINCENZ SISON,)	Commit Cyberstalking
)	18 U.S.C. § 2253(a) – Criminal Forfeiture
Defendants.)	
		OAKLAND VENUE

I N F O R M A T I O N

The United States Attorney charges:

COUNT ONE: (18 U.S.C. § 2252A(a)(3)(B) – Solicitation of Child Pornography)

On or about September 1, 2019, in the Northern District of California, the defendant,

DELANEY TANG,

did knowingly solicit using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, any material that contains a visual depiction of an actual minor engaging in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(3)(B).

COUNT TWO: (18 U.S.C. §§ 371 & 2261A(2)(B) – Conspiracy to Commit Cyberstalking)

From on or about August 11, 2019 and continuing until on or about September 7, 2019, in the Northern District of California, the defendants,

1 DELANEY TANG and VINCENZ SISON,
 2 knowingly and willfully conspired and agreed together and with each other to commit any offense
 3 against the United States, that is: cyberstalking in violation of Title 18, United States Code, Section
 4 2261A(2)(B), as further set out below.

5 Manner and Means of the Conspiracy

6 As part of the conspiracy, the defendants, with the intent to harass and intimidate, used an
 7 interactive computer service, electronic communication service, and/or electronic communication
 8 system of interstate commerce, specifically Instagram, to engage in a course of conduct that caused,
 9 attempted to cause, and was reasonably expected to cause substantial emotional distress to Minor
 10 Victim 6 ("MV-6"). Specifically, DELANEY TANG harassed and intimidated MV-6 to send him
 11 sexually-explicit photos and videos of herself. When MV-6 blocked TANG's Instagram account,
 12 VINCENZ SISON contacted MV-6 and threatened that her sexually-explicit photos and videos would
 13 be exposed if she did not unblock TANG's Instagram account.

14 Overt Acts

15 In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt
 16 acts, among others, were committed in the Northern District of California:

17 On or about August 11, 2019, VINCENZ SISON sent MV-6 messages over Instagram directing
 18 MV-6 to unblock TANG's Instagram account and threatening to release MV-6's sexually explicit photos
 19 and videos.

20 On or about September 1, 2019, DELANEY TANG sent MV-6 multiple messages over
 21 Instagram, telling MV-6 that she needed to send him a new sexually explicit video or he would release
 22 MV-6's prior sexually explicit videos and photos.

23 All in violation of Title 18, United States Code, Section 371.

24 FORFEITURE ALLEGATION: (18 U.S.C. § 2253(a))

25 The allegations contained in Count One of this Information are re-alleged and incorporated by
 26 reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

27 Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offense set forth
 28 in Count One of this Information, the defendant,

1 DELANEY TANG,

2 shall forfeit to the United States of America:

- 3 a. any visual depiction described in Title 18, United States Code, Sections 2251 or
4 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter
5 which contains any such visual depiction, which was produced, transported, mailed,
6 shipped or received in violation of Title 18, United States Code, Chapter 110;
7 b. any property, real or personal, constituting or traceable to gross profits or other
8 proceeds obtained from the offense; and
9 c. any property, real or personal, used or intended to be used to commit or to promote
10 the commission of the offense.

11 If any of the property described above, as a result of any act or omission of the defendant:

- 12 a. cannot be located upon exercise of due diligence;
13 b. has been transferred or sold to, or deposited with, a third party;
14 c. has been placed beyond the jurisdiction of the court;
15 d. has been substantially diminished in value; or
16 e. has been commingled with other property which cannot be divided without
17 difficulty,

18 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
19 United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)
20 and Title 28, United States Code, Section 2461(c).

21 All pursuant to Title 18, United States Code, Section 2253, Title 28, United States Code,
22 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

23
24 DATED: February 10, 2021_____

DAVID L. ANDERSON
United States Attorney

25
26 /s/ Christopher Vieira
CHRISTOPHER VIEIRA
27 Special Assistant United States Attorney
28